

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 12**

**NATURE COAST EMS FOUNDATION, INC.,**

**Employer**

**and**

**Case Number: 12-UC-266313**

**INTERNATIONAL ASSOCIATION OF EMT'S  
AND PARAMEDICS/NAGE/SEIU LOCAL 5000,  
LOCAL R5-365,**

**Petitioner**

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**MOTION TO POSTPONE HEARING**

COMES NOW, the Employer, NATURE COAST EMS FOUNDATION, INC. (Nature Coast EMS), by and through the undersigned counsel, and files this *Motion to Postpone Hearing* and as grounds for postponement would state as follows:

1. A Notice of Hearing was issued on October 27, 2020 setting a hearing date of November 4, 2020 at 9:30 a.m.
2. This Motion is to request a postponement of the hearing date until after November 13, 2020.
3. Legal counsel for Nature Coast EMS serves as County Attorney for Sumter County, Florida, and in that capacity is legal counsel to the Sumter County Canvassing Board, and as a result, is required to attend all meetings of the Sumter County Canvassing Board convened between now and the preliminary certification of the general election results which is to occur Friday, November 6<sup>th</sup>, 2020.

4. The schedule of meetings is set by the Sumter County Canvassing Board and is determined both by statutory requirements and voter turnout volume. As legal counsel, the undersigned has limited ability to reschedule Canvassing Board obligations.

5. Dependent on whether the results of the General Election in Florida trigger a mandatory machine recount or manual recount, the Sumter County Canvassing Board may need to continue to convene the week of November 9<sup>th</sup> – 13<sup>th</sup> to undertake a recount if one is order. However, whether a recount is required will not be known until after November 3, 2020.

6. Given the undersigned counsel's obligations to the Sumter County Canvassing Board in the next week, or possibly two, there is inadequate time to prepare for a hearing on November 4, 2020, and legal counsel is unavailable for attendance at the currently scheduled hearing due to her canvassing obligations.

7. The undersigned asks for the Hearing Officer's consideration in postponing and rescheduling the hearing, so that the undersigned may fulfill her obligations to the Sumter County Canvassing Board to carry out its General Election responsibilities in conducting a fair and accurate election.

8. The undersigned has conferred with Ms. Caroline Leonard, the Attorney Investigator, assigned to this matter, to explain the scheduling conflict.

9. The undersigned has conferred with Doug Hall, legal counsel for the Petitioner, and he has no objection to this request. He is also available for a proposed reschedule of the hearing for Monday, November 23, 2020 at 9:30 a.m. if this timeframe will work for the hearing officer.

10. This request is made in good faith and not for the purpose of delay.

**WHEREFORE**, Employer respectfully requests a postponement of the hearing and potential reschedule for Monday, November 23, 2020 at 9:30 a.m.

Respectfully submitted this 28<sup>th</sup> day of October, 2020.

/s/ Jennifer C. Rey  
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Counsel for the Employer

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of Employer's *Motion to Postpone Hearing* has been filed this 28<sup>th</sup> day of October, 2020 via the NLRB eportal, and has been furnished by email correspondence to Caroline Leonard, [Caroline.Leonard@nlrb.gov](mailto:Caroline.Leonard@nlrb.gov), and Doug Hall, [dhall@nage.org](mailto:dhall@nage.org).

/s/ Jennifer C. Rey  
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